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October 9, 2019

VIA E-FILING

Jocelyn Boyd, Esquire
Chief Clerk and Administrator
South Carolina Public Service Commission
101 Executive Center Drive
Columbia, SC 29210

RE: Annual Review of Purchased Gas Adjustment and Gas Purchasing Policies of
Dominion Energy South Carolina, Incorporated f/k/a South Carolina Electric &
Gas Company
Docket No. 2019-5-G

Dear Ms. Boyd:

I represent the South Carolina Energy Users Committee ("SCEUC"). I am in the receipt of the correspondence of the Office of Regulatory Staff ("ORS") General Counsel Jeff Nelson informing the commission that Dominion Energy South Carolina, Inc.'s ("DESC") request to modify its interruptible tariffs is beyond the scope of the above proceeding. For the reasons set out, SCEUC agrees with the ORS and respectfully requests that the Commission deny DESC the requested relief in the instant docket.

As pointed out by the ORS, the scope of the annual Purchased Gas Adjustment proceeding established in Order No. 87-898 is "to review the purchased gas adjustments and gas purchasing policies" of the Company. The Commission has not since altered the PGA's well-established scope. A tariff change should be accomplished through other procedural means available to DESC by law. *See, e.g.,* S.C. Code Ann. § 58-5-240. In addition, DESC's interruptible customers were not provided with notice of the requested tariff changes. The notices published on the Commission's website and those sent to DESC's customers were silent as to the requested changes and DESC first raised the request in its direct testimony and only after the intervention period had closed.

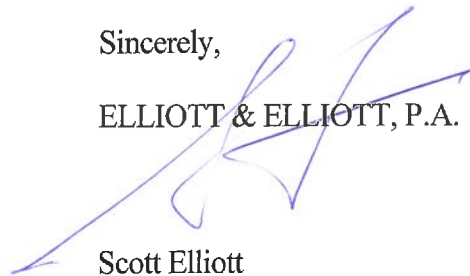
SCUEC appreciates the fact that the ORS and DESC are willing to attempt to resolve the matter by negotiation. However, should DESC decline to voluntarily withdraw its tariff change

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request, SCEUC respectfully requests the Commission deny DESC's request to modify its interruptible tariff as proposed in its testimony.

Sincerely,

ELLIOTT & ELLIOTT, P.A.

A handwritten signature in blue ink, appearing to be "Scott Elliott", is written over the printed name and firm name.

Scott Elliott

SE/lbk
Enclosures

cc: All parties of record (Via Electronic Mail)